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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-0434 WHA
)	
Plaintiff,)	PROPOSED ORDER AND
)	STIPULATION EXCLUDING TIME
v.)	FROM THE SPEEDY TRIAL ACT
)	CALCULATION
JOSE TELLEZ-JACOBO,)	(18 U.S.C. § 3161 (h)(8)(A))
)	
Defendant.)	
)	

The parties stipulate and agree, and the Court finds and holds, as follows:

1. The parties appeared on the instant matter June 19, 2006 for defendant's arraignment on the indictment before the Honorable Maria-Elena James. On June 19, 2006, the matter was continued to June 27, 2006 for initial appearance in front of the Honorable William H. Alsup.

2. On June 27, 2006, the parties appeared in front of the Honorable William H. Alsup and the matter was continued to July 5, 2006 for status / trial setting.

3. On June 27, 2006, Assistant Federal Public Defender Ronald Tyler, who represents the defendant, requested an exclusion of time from June 27, 2006 to July 5, 2006, based on effective

1 preparation of counsel. The parties moved that this same time period be excluded from the
2 calculation of time under the Speedy Trial Act.

3 4. In light of the foregoing facts, the failure to grant the requested exclusion would
4 unreasonably deny counsel for the defense the reasonable time necessary for effective
5 preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(A),
6 (B)(iv). The ends of justice would be served by the Court excluding the proposed time period.
7 These ends outweigh the best interest of the public and the defendant in a speedy trial. See id. §
8 3161(h)(8)(A).

9 5. For the reasons stated, the time period from June 27, 2006 through July 5, 2006 shall
10 be excluded from the calculation of time under the Speedy Trial Act.

11
12 IT IS SO STIPULATED.

13
14 DATED: June 27, 2006

Respectfully Submitted,

15
16 /S/
17 NAHLA RAJAN
18 Special Assistant United States Attorney

19 DATED: July 5, 2006

20 /S/
21 RONALD TYLER
22 Counsel for Jose Tellez-Jacobo

23
24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 DATED: July 17, 2006

